FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

SEALED

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VICTOR RAMIREZ,

Defendant.

4:16CR 3054

INDICTMENT
18 USC § 1951

The Grand Jury charges that

INTRODUCTION

1. At all times material to this indictment the defendant, Victor Ramirez, was a drug technician employed by the Nebraska State Probation Office in Lexington, Nebraska. As part of his official duties the defendant assisted with the supervision of a confidential informant, whose identity is known to the grand jury, hereafter CI, while the CI was on probation. While on probation the CI was required to submit urine or breath samples for testing to determine whether the CI was consuming alcohol or non-prescription drugs, and it was a part of the defendant's duties to collect these urine or breath samples, conduct screening tests on them to determine drug and/or alcohol usage by the CI, and to document the results of the tests. If the screening test indicated the presence of drugs or alcohol, the sample would be sent to a laboratory for further testing.

2. Between on or about August 25, 2015 and continuing until on or about December 16, 2015, in the District of Nebraska, the defendant did knowingly affect and attempted to affect in any way and degree commerce and the movement of articles and commodities in commerce by extortion as those terms are defined in Title 18 United States Code, section 1951, that is, the defendant obtained property not due defendant or his office from the CI, with the CI's consent,

under color of official right, in that in exchange for money paid by the CI to the defendant, the defendant:

> a) Provided information to the CI which was not otherwise available to the general public, to wit: vehicle registration information pertaining to individuals and license plate numbers provided by the CI to the defendant, and
>
> b) Provided information to the CI which was not otherwise available to the general public, including but not limited to: whether arrest warrants existed for the CI and for other individuals identified by the CI, and whether the CI and others identified by the CI were listed in the Nebraska Incident Based Reporting System, and
>
> c) Falsely documented the CI as having provided urine or breath samples which tested negative for non-prescription drugs and alcohol when in fact the CI had not provided such urine or breath samples.

COUNT 1

3. Paragraphs 1 and 2 of this Indictment are realleged and incorporated as if set forth fully herein.

4. On or about September 22, 2015, in the District of Nebraska, Defendant Victor Ramirez for money paid to him by the CI, provided information to the CI pertaining to a person of interest to the CI, including but not limited to: whether the person of interest was named as a party in a court case, accident and citation information, and whether the person of interest was listed in the Nebraska Incident Based Reporting System.

In violation of Title 18 United States Code Section 1951.

COUNT 2

5. Paragraphs 1 and 2 of this Indictment are realleged and incorporated as if set forth fully herein.

6. On or about October 2, 2015, in the District of Nebraska, Defendant Victor Ramirez for money paid to him by the CI, provided information to the CI including but not limited to: whether arrest warrants existed for the CI, and for a person of interest to the CI, vehicle title

information pertaining to the person of interest to the CI and whether the person of interest to the CI was listed in the Nebraska Incident Based Reporting System.

In violation of Title 18 United States Code Section 1951.

COUNT 3

7. Paragraphs 1 and 2 of this Indictment are realleged and incorporated as if set forth fully herein.

8. On or about October 5, 2015, in the District of Nebraska, Defendant Victor Ramirez for money paid to him by the CI, falsely documented that the CI had provided a urine or breath sample which tested negative for non-prescription drugs and alcohol when in fact no such urine or breath sample had been provided.

In violation of Title 18 United States Code Section 1951.

COUNT 4

9. Paragraphs 1 and 2 of this Indictment are realleged and incorporated as if set forth fully herein.

10. On or about October 23, 2015, in the District of Nebraska, Defendant Victor Ramirez for money paid to him by the CI, falsely documented that the CI had provided a urine or breath sample which tested negative for non-prescription drugs and alcohol when in fact no such urine or breath sample had been provided.

In violation of Title 18 United States Code Section 1951.

COUNT 5

11. Paragraphs 1 and 2 of this Indictment are realleged and incorporated as if set forth fully herein.

12. On or about December 3, 2015, in the district of Nebraska, Defendant Victor Ramirez for money paid to him by the CI, provided information to the CI including but not

limited to: vehicle registration information pertaining to vehicles identified by the CI, and for information pertaining to the age, date of arrest, date of release from custody, and bond information pertaining to an individual identified by the CI; and for falsely documenting that the CI had provided a urine or breath sample which tested negative for non-prescription drugs and alcohol when in fact no such urine or breath sample had been provided.

In violation of Title 18 United States Code Section 1951.

COUNT 6

13. Paragraphs 1 and 2 of this Indictment are realleged and incorporated as if set forth fully herein.

14. On or about December 16, 2015, in the district of Nebraska, Defendant Victor Ramirez for money paid to him by the CI, provided information to the CI including, but not limited to: vehicle registration information pertaining to a vehicle identified by the CI, and for falsely documenting that the CI had provided a urine or breath sample which tested negative for non-prescription drugs and alcohol when in fact no such urine or breath sample had been provided.

In violation of Title 18 USC Section 1951..

A TRUE BILL.

[redacted]

FOREPERSON

DEBORAH R. GILG
United States Attorney
District of Nebraska

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

ALAN EVERETT
Assistant United States Attorney